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IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA

Richard Glossip, et.al.,
PLAINTIFFS,

vs.

Randy Chandler, et.al.,
DEFENDANTS,

WADE GREENE, PLAINTIFF AS PLAINTIFF.

PLAINE CO. CN-14-665-E

FILED

APR 23 2021

CARMELITA REEDER SHINN, CLERK
U.S. DIST. COURT, WESTERN DIST. OKLA.
BY al, DEPUTY

PLAINTIFF (WADE GREENE) MOTION FOR DISCLOSURE

PURSUANT TO FED. R. CIV. P. RULE 26(a)(3)(B)

(4); AND RULE 26(b)(1) & (3) (WITH BRIEF IN SUPPORT)

COME now (WADE GREENE) TO MOTION THIS COURT TO
ORDER OKLAHOMA DEPT. OF CORRECTIONS TO PROVIDE

DOCUMENTS "RELEVANT TO ANY PARTY'S CLAIM... PROPORT-

WADE GREENE LAW # 56223

OKLAHOMA STATE PENITENTIARY

P.O. BOX 97

MATLASSIER, OKLA. 74602

DATE:

PRO-SE

D.C. 2

"CONAL TO THE NEEDS OF THE CASE, CONSIDERING THE
IMPORTANCE OF THE ISSUES AT STAKE IN THE ACTION".
(EMPHASIS ADDED).

THE UNITED STATES SUPREME COURT HAS DECLARED,
THAT: "DEATH IS DIFFERENT", THAT ANY DEATH
PENALTY CASE DESERVES PREFERENCE, WITH A DISP-
POSITION TOWARDS ACCOMODATION, ESPECIALLY WHEN
A PERSON IS ACTING PRO-SE AS A PRISONER. THE
OKLAHOMA DEPT. OF CORRECTIONS DOES THE OPPOSITE,
TENEN REFUSING TO PROVIDE INFORMATION AND FOR
REMEDIAL ASSISTANCE WHEN PRISON OFFICIALS VIOLATE
A PRISONER'S RIGHTS, THAT IS REQUIRED OF THEM BY
LAW AND O.D.O.C. POLICY REGULATIONS.
ONE EXAMPLE IS EASILY DISPLAYED. IN EXHIBIT

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1160-A, A REQUEST TO STAFF^(R.T.S.) DATED 03/15/2021, R.T.S. NO.

21-1304, WADE LAY MAKES A REQUEST FOR INFORMATION AND

DOCUMENTS STATE LAW ORLA. STAT. TIT. 57, § 549(a)(8) MAKES

REQUISITE TO DEDUCT AND TRANSFER TRUST FUND DOLLARS

FROM A PRISONER'S TRUST FUND ACCOUNTS.

THE PLAINTIFF HAD IN THE PAST, AS INDICATED IN THE

SUBJECT PORTION OF THE R.T.S., SENT NUMEROUS R.T.S.

TO VARIOUS DEPARTMENT HEADS, AND WAS EVEN INSTRUCTED

BY LEON WILSON (O.D.O.C. CONTROLLER) TO SUBMIT A R.T.S.

TO O.S.P. OFFICIALS FOR SUCH DOCUMENTS AS THAT REQUESTED

IN THE R.T.S. NO. 21-1304. (SEE EXH. 1160-A). THE PLAINTIFF

WRITES: "THIS IS THE 7TH REQUEST TO STAFF FOR

"THIS INFORMATION". IF THE COURT WILL VIEW THE

ACTION OF N. BATTLES (STAFF MEMBER, (WADDEO'S ASSIST.))

F.O.R.E.

1) SEE EXHIBIT 1160-C, R.T.S. TO MR. SHARP IN REQUEST
OF 2019.

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MURKIN BATTLES MISAPPROPRIATES THE RULE, O.D.O.C.

OP-090124 STATES: "B.I.S. MUST BE SUBMITTED T

DAYS OF INCIDENT. THIS IS BEING RETURNED FOR

NOT FOLLOWING OP-090124."

IN THE ACTION REQUESTED PORTION THE COURT WILL

SEE THE LOGICAL AND RELEVANT REQUEST FOR THE

O.S.P. FACILITY HEAD TO: "PROVIDE THE DOCUMENTS,

OR DECLARE THE ABSENCE OF THOSE NECESSARY

DOCUMENTS." WHAT IS CRITICAL TO NOTE, IS THAT

THE OKLA. INSPECTOR GENERAL HAD VISITED

WADE LAY AT O.S.P. ON FEBRUARY 23, 2021, AND

WADE LAY HAD WRITTEN THE OKLA. DEPT. OF CORRECT-

IONS DIR. SCOTT CROW ABOUT THE O.I.G. VISIT,

AND SO BOTH THE DIRECTOR AND THE O.I.G. WERE

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ACTUALLY INVESTIGATE THE SUBJECT MATTER OF
THE R.T.S. NO. 21-1304, AND MISS BATTLES WAS
PRIVY TO THIS FACT.

IF THE COURT WILL VIEW EXHIBIT 1160-B, JUDGE
PRIOT WILL SEE A LETTER DATED 03/05/2021
FROM NICOLE FLEMING (APPPOINTED BY SCOTT CROW)
THAT INSTRUCTS LAUREN LAY TO SUBMIT A R.T.S.

FORM TO ADDRESS THE SAME ISSUE THAT HAD BEEN
ADDRESSED OVER (7) SEVEN TIMES SINCE SEPT.

14, 2018 WHEN * T296 WAS REMOVED FROM LAY'S
MANDATORY SANCTIONS AND SENT TO THE U.S.D.C.
W.D.OK... (SEE HAY V. O.D.O.C. NO. 20-6038 OPENING

BRIEF DOC. NO. 010110372594, AT PG. 4-6).

MISS BATTLES AND MISS FLEMING WERE BOTH AWARE

F.I.
*) WHILE LAY RECEIVES THE ON THE 9TH OF MARCH 2021, 6 DAYS
PRIOR TO MARCH 15, 2021, THE DATE OF THE R.T.S. NO. 21-1304.

D.C. 6

OF THE O.I.C. INVESTIGATION, OF THE CURRENT
PROCLIVITY OF THE ISSUE, YET THEY CONSPIRE
TO PREVENT DISCLOSURE, EVEN IN A SETTING WHERE O.D.O.C.
POLICY REQUIRES THEY ACCOMMODATE THE REQUEST.
ADDITIONALLY, WHEN PRISON OFFICIALS VIOLATE
A PRISONER'S CONSTITUTIONAL RIGHTS IN AN ACTION
THAT ALSO VIOLATES STATE LAW, AND THE ACT IS
DONE IN SECRET, OR TO SAY, OUTSIDE THE PRISONER'S
ABILITY TO KNOW ABOUT THE ACT UNTIL HE SEES
THE ADVERSE EFFECTS OF IT, THE MATTER IS
NOT TIME BARRED BY POLICY GUIDELINES, AND
MORE IMPORTANTLY, WHEN IT IS CLEAR, THAT PRISON
OFFICIALS AND D.O.C. OFFICIALS MANIPULATE THEIR OWN
RULES TO DESTROY CONSTITUTIONAL RIGHTS COMPLICITY

BC-7

TO STATE LAW, KNOWING THEY ARE VIOLATING ESSENTIAL
CONSTITUTIONAL RIGHTS, AND THE LAWS OF THE U.S. AND
THE STATE OF OKLA., SOVEREIGN IMMUNITY IS NOT
APPLICABLE AND THE STATE ACTORS ARE LIABLE.

MISS BATTLES KNOWS THE I.T.T. NO. ZI-1304 IS NOT
TIME BARRED, AND THE DIRECTOR SCOTT CRAN KNOWS
FROM MULTIPLE SOURCES, THAT HIS SUBORDINATES
PURPOSELY SUPPRESS MERITORIOUS COMPLAINTS BY
PRISONERS AND THEIR FAMILIES CONCERNING GRAVE
ISSUES OF MISCONDUCT BY PRISON OFFICIALS. WHAT IS
RELEVANT TO THIS CASE, IS THAT, THIS OVERRIDING ATTITUDE
OF RETALIATION, WHERE DEPRIVATION OF RIGHTS AND BRUTAL
ABUSE IS THE MEANS OF RETALIATION, THE CODES OF
LAW DEEMED AS THE PROPER PRACTICE OF AN ACTION WAS PICTURED

PCB 8

TO BE INADEQUATE.

THE ABUSES AND PREJUDICE IN WADE LANE'S SITUATION

ALONE SHOULDS GO TO THIS COURT, AND SHOULD BE SHOWN TO

THE PUBLIC THROUGH MEANS OF TRUTH, THE SYSTEMIC

FAILURE AND CONTINUANCE OF CORRUPTION MUST FIRST BE

DEALT WITH BEFORE NEW PROTOCOLS CAN HAVE ANY

AFFECT. JIM CROW AND PEONAGE SHOULD SERVE AS

ADEQUATE EXAMPLES TO THE COURTS OF THE UNITED

STATES. THERE EXIST AN ABUNDANCE OF MATERIAL

ESTABLISHED AS PRECEDENT TO CONVEY THE CONCEPT OF

EQUAL PROTECTION OF THE LAWNS. HOWEVER, DECEITFUL

AND IMMORAL CORRECTIONS OFFICIALS SIMPLY DECLARE

THAT A RULE IS BEING UPHELD, AND THE CLAIM MADE BY

THE PRISONER IS INACCURATE, IN OTHER WORDS, THE C.D.O.C.

BELIEVES THAT A FALSE STATEMENT, IS, A SIMPLE LIE CAN
OVERCOME FACT. THIS IS WHY THE PRESS RELEASE BY
MR. SCOTT CROW TO THE PUBLIC, BEFORE, AND IN PARTICULAR
AFTER AN EXECUTION, IS A MEANS OF DECEPTION RELIED
UPON TO AVOID ACCOUNTABILITY.

THE CONTAMINATE OF CORRUPTION IS A MATTER OF CURRENT
SIGNIFICANCE WHEN MODES OF PROCEEDINGS OR CODES
OF LAW DICTATE THE PROCESS IS RELIED UPON TO RESOLVE
SUCH A CONSTITUTIONAL RIGHT AS THAT PROTECTED UNDER
THE EIGHTH AMENDMENT. ESPECIALLY WHEN THOSE
PROTOCOLS ARE COVERING THE TERMINATION OF A HUMAN
LIFE.

MADE LAY KNOWS FROM HIS OWN OBSERVATIONS, THAT THE
LOCKER AFFAIR IN 2014, IS A MATTER CAUSED BY THIS

SAME CONCERN. A DISPOSITION OR ATTITUDE THAT

PERMEATES THE O.D.O.C., AND IS NOT A DISEASE

THAT CAN BE ERADICATED THROUGH MEANS OF - A CHANGE

OF LEADERSHIP. THE CONTAMINATION IS INTRINSIC, IT

IS IDENTICAL TO THE PROBLEM OF RACISM, THE

EMPLOYEES AT THE O.D.O.C. DO NOT BELIEVE LIVING

TO THE PEOPLE, THE PRESS, OR THIS COURT IS WRONG,

BECUSE, THEY DO NOT BELIEVE PRISONERS ARE ENTITLED TO

THE PROTECTION OF LAW. A CRICK EXAMPLE CAN BE

CIVEN: STATE LAW, O.B. LAW, O.D.O.C. POLICY AND COMMODO

LAW PRECEDENT MANDATES CERTAIN RIGHTS AS FUNDAMENTAL,

RIGHTS: THE RIGHT TO HEAT IN WINTER, SHOWERS (3) THREE

TIMES A WEEK, AND A PARTICULAR STANDARD OF NUTRITION. ALL

OF THESE RIGHTS ARE REGULARLY VIOLATED AT O.S.P.. THEY

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SIMPLY LIVE ABOUT IT!

AS THE PLAINTIFF WRITES THIS PLEADING, ON 03/28/2021,

SUNDAY, HE HAS NOT SHOWERED SINCE LAST THURSDAY

BECAUSE SHOWERS SCHEDULED FOR SATURDAY, 03/27/2021

WILL BE SIMPLY IGNORED BY O.S.P., A REGULAR OCCURRENCE.

O.S.P. CANNOT FULFILL THE OBLIGATIONS OF THE INSTITU-

TIONAL PROTOCOLS ESTABLISHED BY THE O.D.O.C. WHICH

BEGAN EARLY IN 2010, DUE TO DECREASING BUDGETS AS A

RESULT OF THE 2008 FINANCIAL CRISIS.

IT IS IN FACT, THAT PARTICULAR ISSUE WHICH IS DETAILED

IN Valade *vs* David Orman, CIV-15-MO-FAS-589; AND TO THE

TENTH CIRCUIT *vs* Valade *vs* O.D.O.C., NO. 20-6038; THAT HAS BROUGHT

ABOUT THE MOST SEVERE ACTS OF ABUSE BY THE

O.D.O.C. TOWARDS VERA LEE.

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THE O.D.O.C. HAS LIED TO THE PEOPLE OF THIS STATE
FOR (11) ELEVEN YEARS. MILLIONS OF DOLLARS EACH
YEAR IS MISDIRECTED TO MORE THAN JUST UNNECESSARY
PROTOCOLS, BUT TO Ludicrous REQUIREMENTS THAT SERVE
NO PURPOSE, ALL UNDER PRETENSE OF SECURITY. A-UNIT,
THIS BUILDING, AT GREAT EXPENSE IN 1989 WAS SOLD TO THE PUBLIC
UNDER THE SUPPOSITION, IT WOULD BE SO COST EFFICIENT TO
RUN. THE PLAINTIFF DID RESEARCH FOR A STATE SENATOR AT THE
TIME OF PUBLIC DEBATE SURROUNDED THE ISSUE.
THE TRUTH IS, THE O.D.O.C. WAS CREATED, TOTALLY DIS-
FUNCTIONAL PROTOCOLS AND MODES OF PROCEEDING, TO REQUITE
EXCESSIVE NUMBERS OF SECURITY OFFICERS TO ACCOMPLISH
THOSE UNNECESSARY PROTOCOLS. THIS UNDERLYING CON-
OPTION BREEDS AN UNMEASURABLE LEVEL OF CONTEMPT

FOR HUMANITY, AS IT IS PRISONERS ARE VIEWED AS

ANIMALS BEING MOVED TO AND FROM PODS OF INHUMANE
ISOLATION.

THIS COURT MUST RECOGNIZE AND ALLOW FOR DISCOVERY, INTO
THE LILE CONDITIONS CREATED BY THE O.D.O.C. FOR
THE SINGULAR PURPOSE OF ACQUIRING EXCESSIVE AND
UNWARRANTED APPROPRIATIONS FROM THE STATE LEGISLATURE.

IT IS ALSO CRITICAL TO UNDERSTAND, THAT AFTER (11) ELEVEN
YEARS OF THIS CORRUPT STATE, THE ADMINISTRATIVE CORPS
OF THE ENTIRE DEPARTMENT (STATE-WIDE) HAS BECOME A
DEPRIVED FRATERNITY. SUCH A BODY CANNOT BE ENTROSTED
WITH THE SACRED TASK THAT HAS BEEN DELAYED NOW
FOR SEVEN YEARS. THE FACTS WILL SHOW, THAT
MR. SCOTT CROW IS AN OLD-SCHOOL GRADUATE OF THAT

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WAY OF THINKING.

THE PLAINTIFF UNDERSTANDS THAT EXECUTION PROTOCOLS

IS THE PRIMARY ISSUE OF THIS CASE; BUT THIS COURT MUST

COMPREHEND, RULES OR CODES OF ETHICS DO NOT ALTER THE

BEHAVIOR OF THOSE INDIVIDUALS (ESPECIALLY WITHIN GOVERNMENT

BUREAUCRATIC CIRCLES) WHO PRACTICE LAWLESSNESS THROUGH

MEANS OF DECEIT. THE UNRULY BEHAVIOR OF O.S.P. IS

A DISPOSITION PERPETUATED BY DESIGN, THE DISOBEDIENT

NATURE OF PRISON OFFICIALS SUCH AS: KIETH SHERWOOD;

JERRY PERRY, AND PATILIE COOPER, REMARKS WITHIN

THE CHARACTERS: MR. FARRELL (WARDEN AT O.S.P. PRESENTLY);

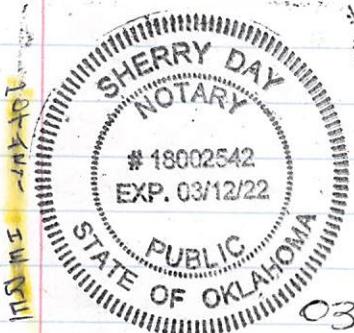
MARGARET GREEN (DEPUTY WARDEN AT O.S.P. PRESENTLY);

AND MRS. KIRBY (MONITOR WIFE, AT O.S.P. PRESENTLY).

IT IS ESSENTIAL TO PLAINTIFF MADE LAY'S ABILITY TO

PGC 15

ENJOY THE PROTECTION OF THE EIGHTH AMENDMENT,
THAT THIS INFORMATION BE MADE AVAILABLE FOR
TRIAL, AND THEREFORE, ABLE TO SEND TO THE
OTHER PARTIES. PLEASE RESPOND QUICKLY!



3-30-21

03/30/2021

RESPECTFULLY SUBMITTED

MARIE LAPI AT O.S.P.

P.O. Box 99

MCALISTER, OKLA. 74602